

## FILE FOLDER

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BLDG # 45 Heavy Equip

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6240  
NREAD  
APR 20 1987

From: Commanding General, Marine Corps Base, Camp Lejeune  
To: Commanding General, 2d Force Service Support Group,  
Camp Lejeune

Subj: HAZARDOUS WASTE (HW) COMPLIANCE INSPECTIONS OF 2D FORCE  
SERVICE SUPPORT GROUP ORGANIZATIONS

Ref: (a) 8th Engineers Support Battalion HW inspection of  
24 Mar 87  
(b) 2d Supply Battalion HW inspection of 24 Mar 87  
(c) 8th Communication Battalion HW inspection of 25 Mar 87  
(d) 2d Maintenance Battalion HW inspection of 26 Mar 87  
(e) BO 6240.5A  
(f) CG/MCB 291625Z Oct/86

1. References (a) - (d) were conducted by Base Environmental personnel in accordance with references (e) and (f). It should be noted that no violations of Environmental Protection Agency regulations described in reference (e) were observed during references (a) - (d).

2. It is recommended that Hazardous Material Disposal Officers for each of the above organizations, closely monitor hazardous waste management activities, and ensure that newly assigned personnel involved in HW management, are provided training required by reference (e).

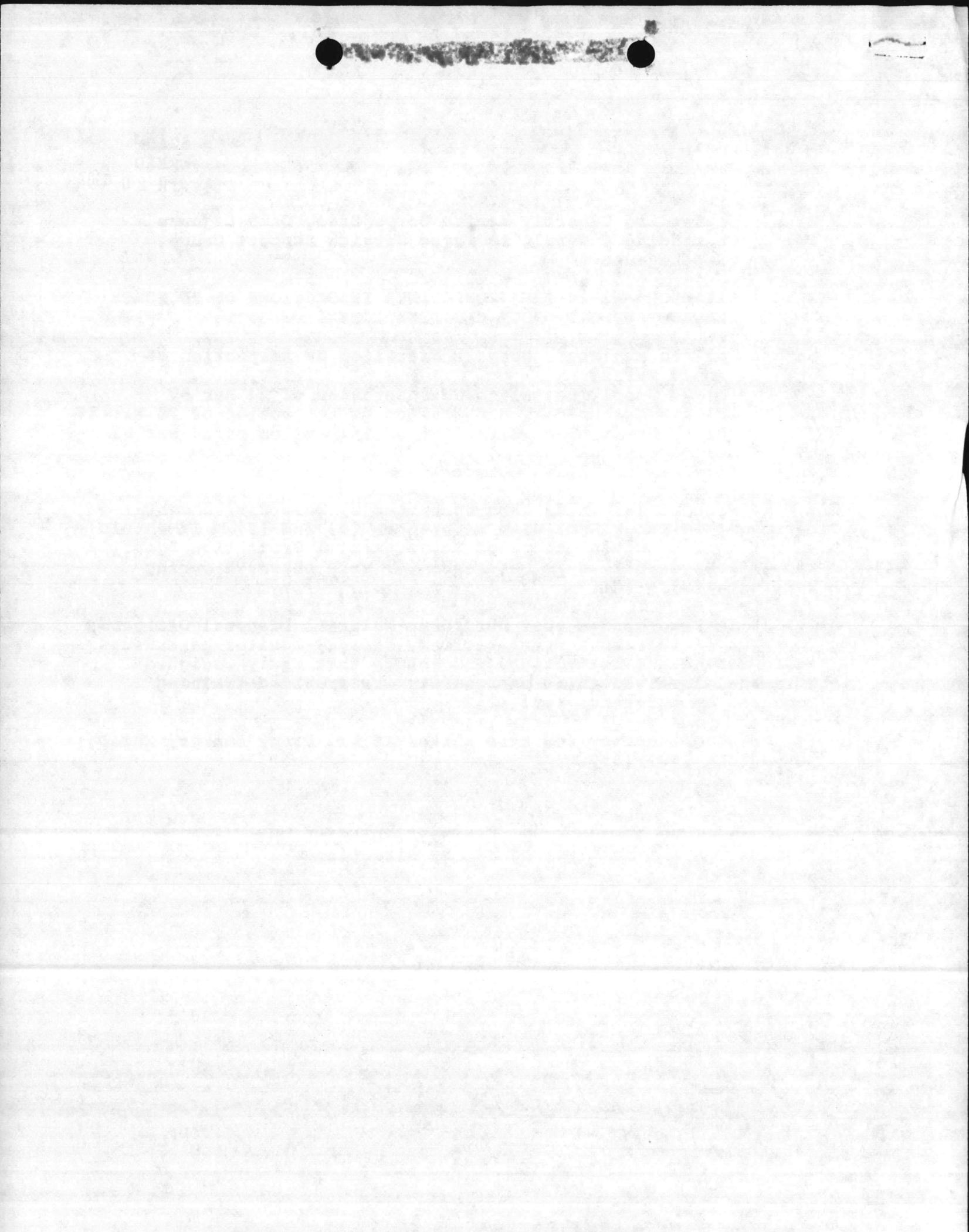
3. Point of contact for this matter is Mr. Danny Sharpe, NREAD, extensions 2083/1690.

T. J. DALSELL  
By direction

Writer/Typist Warren/Sweeney

Date Typed 17 Apr 87

Word Processor Number camping



HAZARDOUS WASTE (HW) MANAGEMENT INSPECTION FORM

Date: 3-24-87

2nd Supply BN.

1. Facility being Inspected: FC-263 Motor Transport Co. X 2020

2. Organization in Charge: 2nd FSSG

3. Inspection Participants/Phone Number: Primary: N.O. Clay / Sgt Howell

X 3504

4. Description of HW Streams: Waste Oil, Electrolyte, Cleaning Solvent

5. Are records of HW generation consistent with HW streams?     

6. HW Training

a. Are job descriptions available for all personnel actively involved in HW management?     ✓    

b. Are training records adequate/current?     ✓    

c. Are alternate personnel assigned to key positions?     ✓      
(If not, explain how unit deals with absence of key personnel)

d. Do contacted personnel demonstrate adequate knowledge of:

- (1) Regulatory Requirements     ✓
- (2) Applicable Base Orders     ✓
- (3) Types of HW Handled     ✓
- (4) Proper Containers     X
- (5) Proper Labeling     ✓
- (6) Weekly HW Inspections     ✓
- (7) HW Turn-in Procedures     ✓
- (8) Health and Safety     ✓
- (9) Spill Reporting Procedures     X
- (10) Spill Response Duties

7. Condition of Storage Facilities

a. Date of last Fire Dept Inspection?     2-26-87    

b. Are spills likely to reach soil or water?     No    

c. Are HW protected from weather?     No    

d. Are weekly HW inspections conducted properly?     ✓



1. The first part of the document is a list of names.

2. The second part is a list of dates.

3. The third part is a list of locations.

4. The fourth part is a list of events.

5. The fifth part is a list of people.

6. The sixth part is a list of organizations.

7. The seventh part is a list of activities.

8. The eighth part is a list of places.

9. The ninth part is a list of things.

10. The tenth part is a list of people.

11. The eleventh part is a list of organizations.

12. The twelfth part is a list of activities.

13. The thirteenth part is a list of places.

14. The fourteenth part is a list of things.

15. The fifteenth part is a list of people.

16. The sixteenth part is a list of organizations.

17. The seventeenth part is a list of activities.

18. The eighteenth part is a list of places.

19. The nineteenth part is a list of things.

20. The twentieth part is a list of people.

21. The twenty-first part is a list of organizations.

22. The twenty-second part is a list of activities.

23. The twenty-third part is a list of places.

24. The twenty-fourth part is a list of things.

25. The twenty-fifth part is a list of people.

e. Are discrepancies corrected promptly? ✓

f. Condition of containers? ("X" indicates discrepancy)

- |                |          |                                |               |
|----------------|----------|--------------------------------|---------------|
| (1) Closed     | <u>✓</u> | (7) Properly Labeled           | <u>✓</u>      |
| (2) Leaking    | <u>✓</u> | (8) Properly Dated             | <u>✓</u>      |
| (3) Bulging    | <u>✓</u> | (9) Properly Stacked           | <u>✓</u>      |
| (4) Collapsed  | <u>✓</u> | (10) Properly Packaged         | <u>✓</u>      |
| (5) Corroded   | <u>✓</u> | (11) Meet DOT Requirements for |               |
| (6) Overfilled | <u>✓</u> | Contents                       | <u>      </u> |

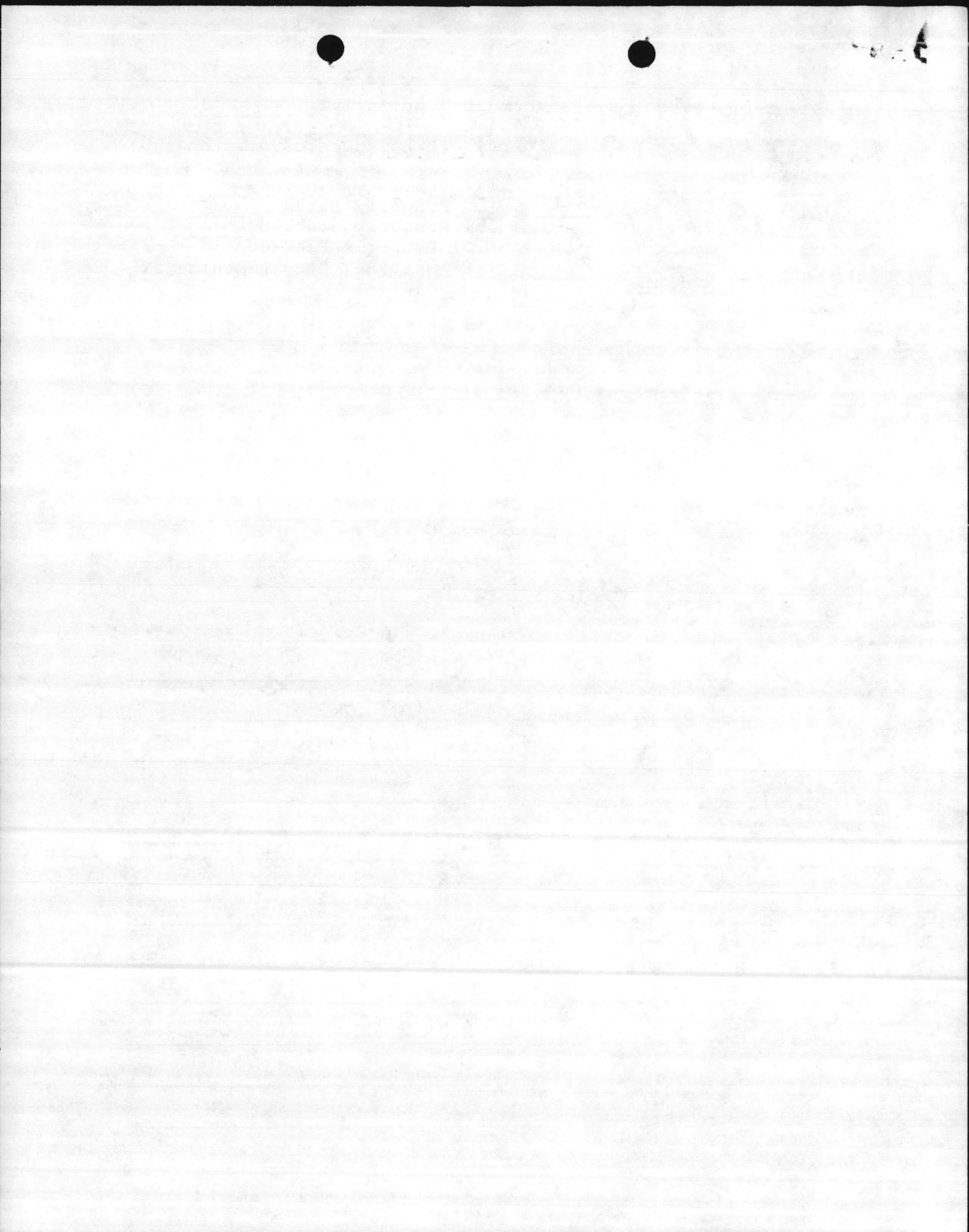
g. Are 90 day turn-in deadlines being met? ✓

h. Are HW turn-in documents being prepared and submitted in a timely, proper manner? ✓

i. Comments: (4) BATTERY Acid stored in wrong  
CONTAINER.

(9) Spill reporting procedures: No sign over  
cleaning vat.

Discrepancies corrected during inspection.



## HAZARDOUS WASTE (HW) MANAGEMENT INSPECTION FORM

Date: 3-24-87

1. Facility being Inspected: TP-457 Supply Bldg
2. Organization in Charge: 2nd FSSA
3. Inspection Participants/Phone Number: W.O. CLAY / S Sgt. Howell <sup>X 3504</sup>

4. Description of HW Streams: HAZARDOUS MATERIALS / Spills?

5. Are records of HW generation consistent with HW streams? NA

## 6. HW Training

a. Are job descriptions available for all personnel actively involved in HW management? ✓

b. Are training records adequate/current? ✓

c. Are alternate personnel assigned to key positions? ✓  
(If not, explain how unit deals with absence of key personnel)

d. Do contacted personnel demonstrate adequate knowledge of:

- (1) Regulatory Requirements ✓
- (2) Applicable Base Orders ✓
- (3) Types of HW Handled NA
- (4) Proper Containers ✓
- (5) Proper Labeling ✓
- (6) Weekly HW Inspections ✓
- (7) HW Turn-in Procedures ✓
- (8) Health and Safety ✓
- (9) Spill Reporting Procedures ✓
- (10) Spill Response Duties ✓

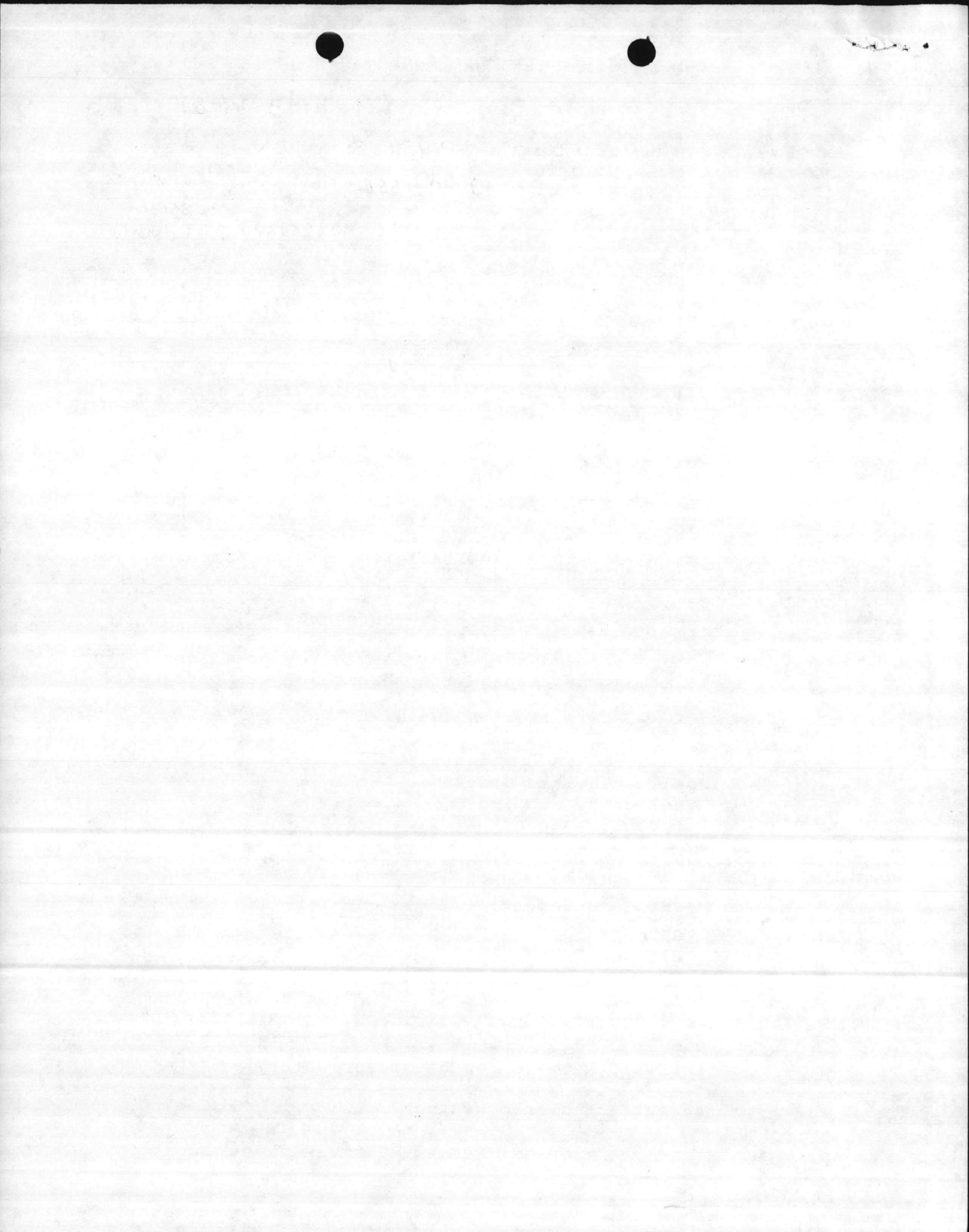
## 7. Condition of Storage Facilities

a. Date of last Fire Dept Inspection? 3-24-87

b. Are spills likely to reach soil or water? No

c. Are HW protected from weather? Yes

d. Are weekly HW inspections conducted properly? Yes



e. Are discrepancies corrected promptly? Yes

f. Condition of containers? ("X" indicates discrepancy)

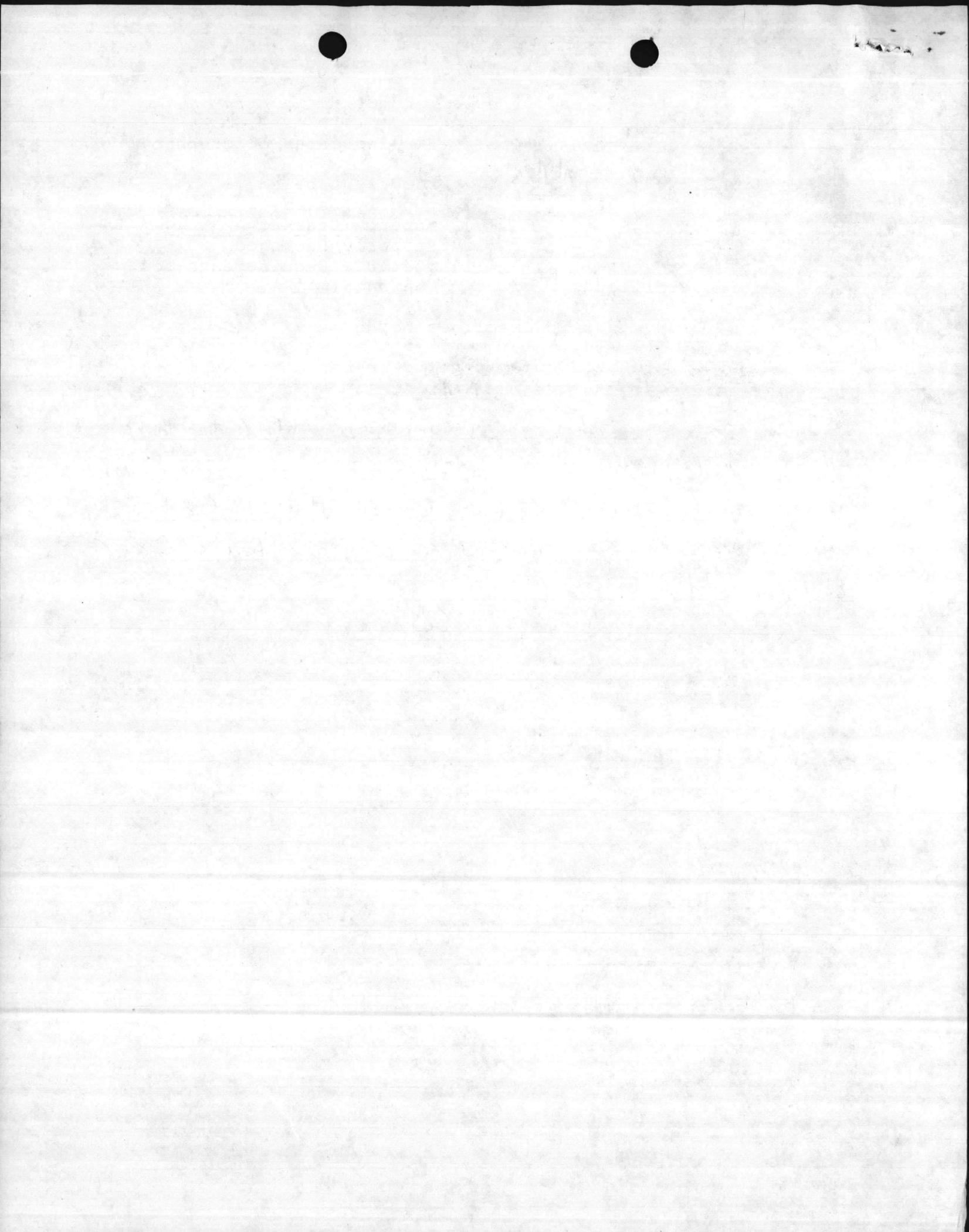
- |                |               |                                |               |
|----------------|---------------|--------------------------------|---------------|
| (1) Closed     | <u>N.A.</u>   | (7) Properly Labeled           | <u>      </u> |
| (2) Leaking    | <u>      </u> | (8) Properly Dated             | <u>      </u> |
| (3) Bulging    | <u>      </u> | (9) Properly Stacked           | <u>      </u> |
| (4) Collapsed  | <u>      </u> | (10) Properly Packaged         | <u>      </u> |
| (5) Corroded   | <u>      </u> | (11) Meet DOT Requirements for | <u>      </u> |
| (6) Overfilled | <u>      </u> | Contents                       | <u>      </u> |

g. Are 90 day turn-in deadlines being met? ✓

h. Are HW turn-in documents being prepared and submitted in a timely, proper manner? N.A.

i. Comments: This is a Warehouse that contains  
H.M. Not waste. No waste is stored or Accumulated.  
Insp. was conducted due to the potential of  
H.M. Spills. Contingency Plan was posted & Filled  
out correctly.

H. WARREN



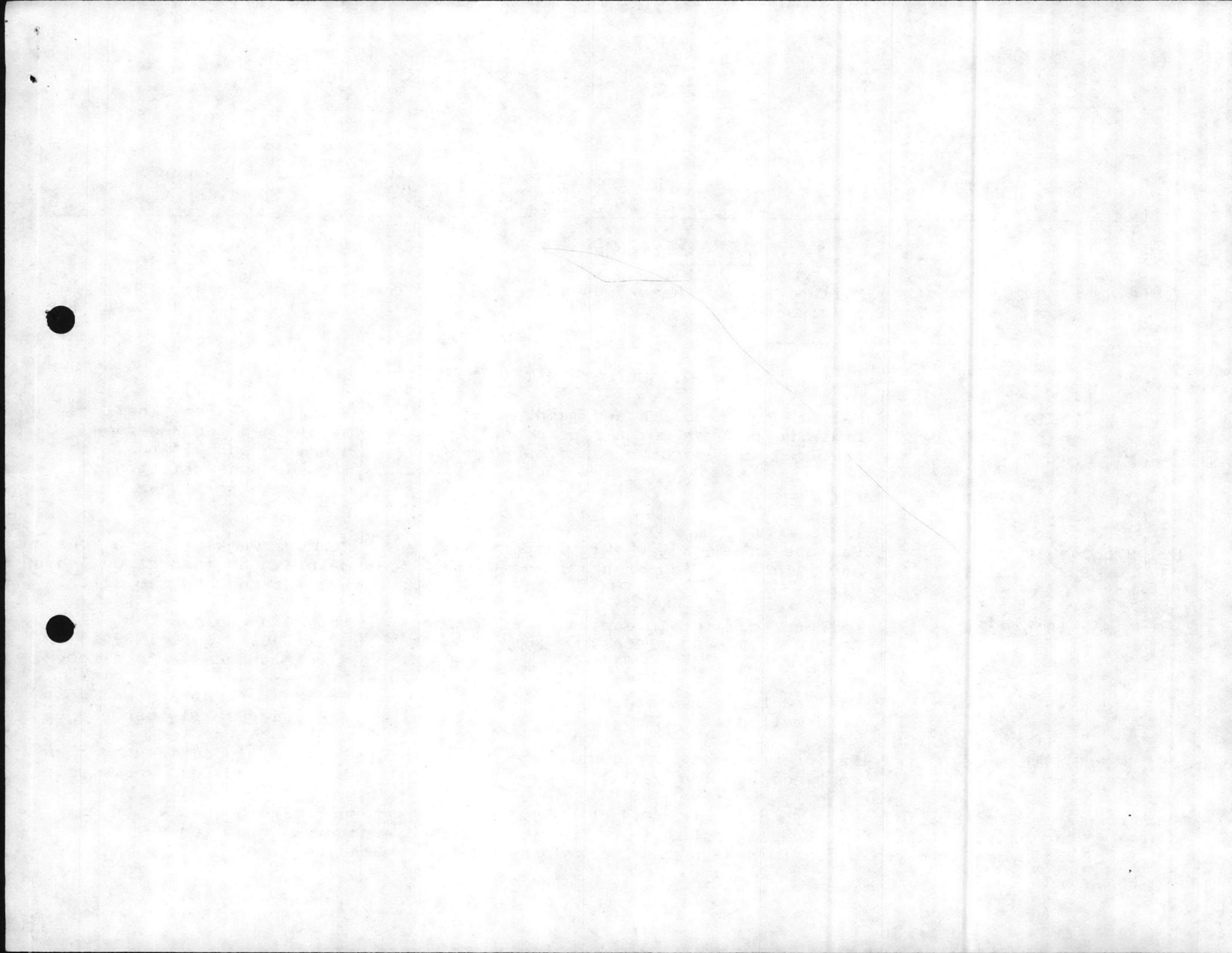
ORGANIZATION:

2d FSSG  
2d Supply BN

INSPECTION DATE: 11 Dec 1986

INSPECTOR'S NAME Sammy Gwynn

NO.	SPECIFIC LOCATION	DISCREPANCY	REF	RECOMMENDED CORRECTIVE ACTION
<u>MOTOR TRANSPORT</u>				
1.				
a.	Bldg. #FC-263	Failure to post hazardous waste spill contingency plan	5	Post spill contingency plan at all hazardous waste sites.
<u>DEPLOYMENT SUPPORT UNIT</u>				
2.				
a.	Bldg. #916	Failure to establish and maintain training records for all personnel involved in hazardous waste management	1	Training records shall be maintained for hazardous waste handlers and alternate to include a description of duties & training received for personnel at each site.
b.	Bldg. #916	Failure to conduct weekly inspections and maintain a log of hazardous waste sites.	2	Conduct weekly inspections and maintain an inspection log on all hazardous waste sites.
c.	Bldg. #916	Failure to maintain copies of BO 6240.5, BO 11090.1B & BO 1109003	3	Maintain copies of BO 6240.5, BO 11090.1B & BO 11090.3 at all hazardous waste sites.
d.	Bldg. #916	Failure to post emergency spill response information	4	Purchase/fabricate and post emergency spill response signs
e.	Bldg. #916	Failure to post hazardous waste spill contingency plan	5	Post spill contingency plan at all hazardous waste sites.
<p>COMMENT: Prior to this inspection, this unit was not considered a hazardous waste accumulation site. Due to the likelihood of Deployment Support Unit being associated with returning units from deployment, they are considered to be a hazardous waste accumulation site.</p>				



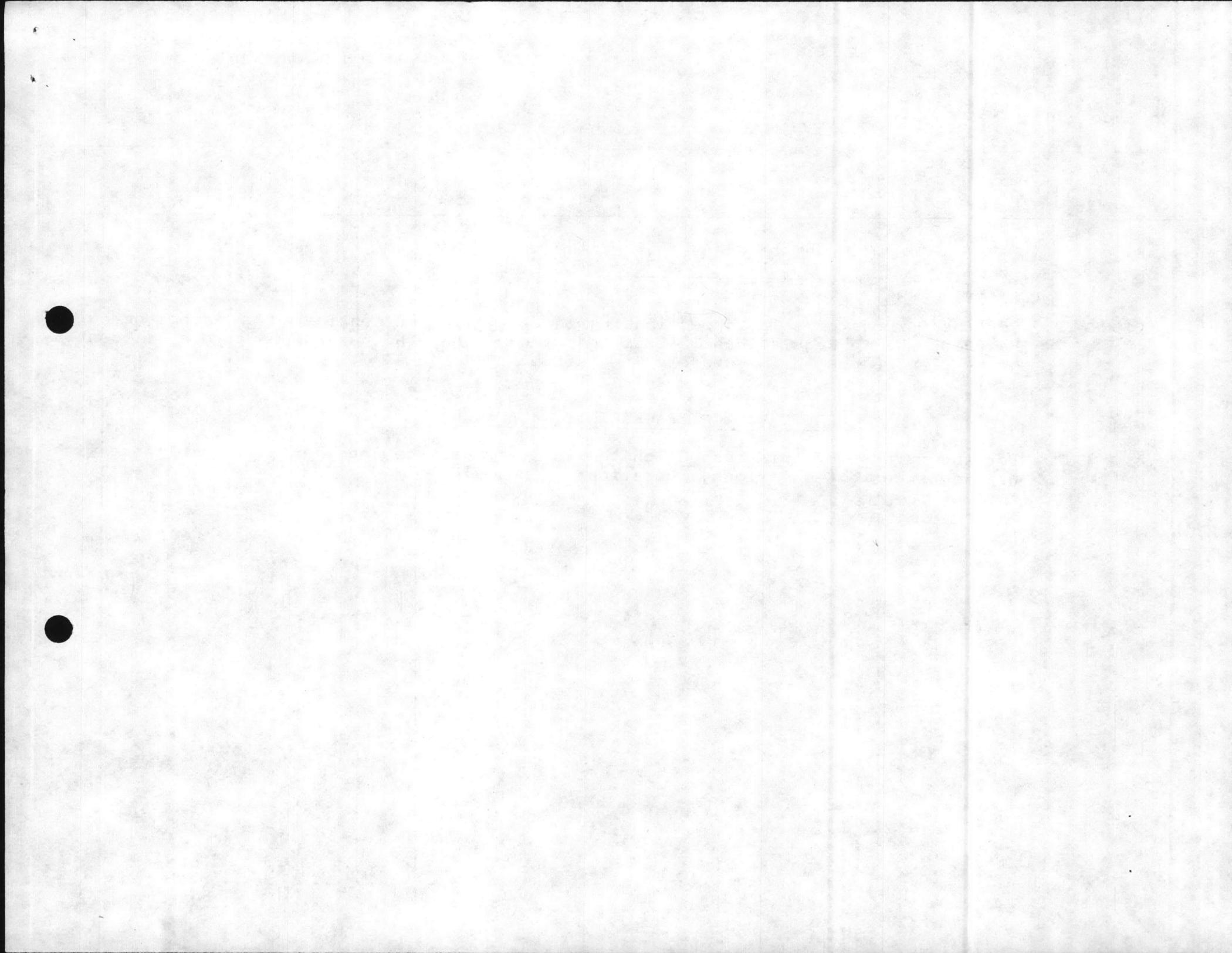
ORGANIZATION:

2d FSSG  
2d Supply BN

INSPECTION DATE: 11 Dec 1986

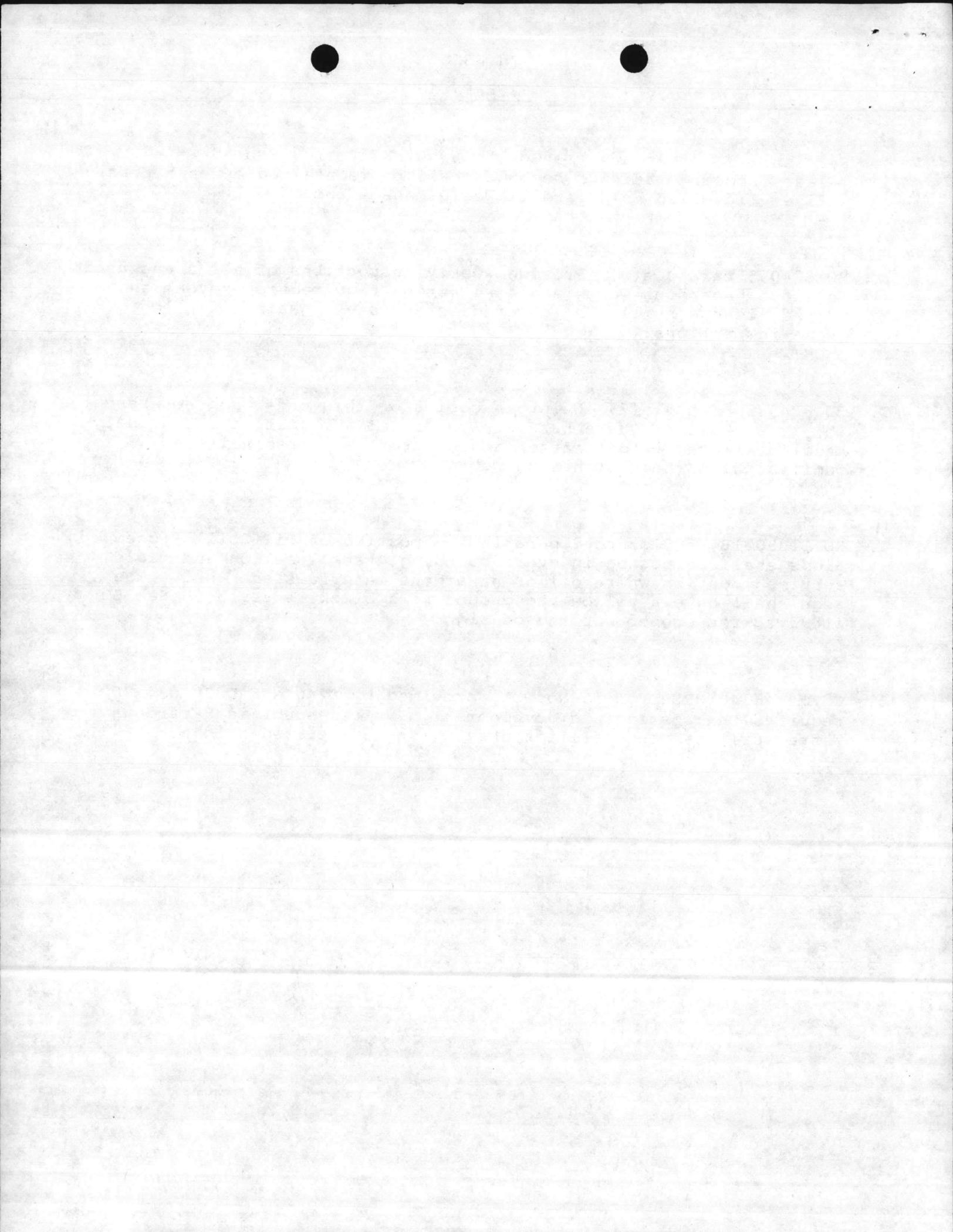
INSPECTOR'S NAME Sammy Gwynn

NO.	SPECIFIC LOCATION	DISCREPANCY	REF	RECOMMENDED CORRECTIVE ACTION
3.		<u>SUPPLY MANAGEMENT UNIT Bldg. TP-457</u>		COMMENT: For the purpose of this inspection the facility will be considered in compliance with Hazardous Waste Regulations. It is recommended that the hazardous waste spill contingency plan be posted immediately. Location: Bldg. TP-457.
4.		<u>PRESERVATION, PACKAGING, &amp; PACKING</u>		COMMENT: For the purpose of this inspection the facility will be considered in compliance with Hazardous Waste Regulations. Location: Bldg. 915.



REFERENCES

1. Section 1 of enclosure (1) CG ltr 6240 NREAD of 9 Sep 85  
"Clear, concise training records shall be maintained on each person actively involved in Hazardous Waste Management."
2. BO 6240.5 para 4.a(5) Provide weekly inspections of all areas used to store hazardous waste and take action required to prevent and correct leaks, spills and other discrepancies. Maintain a log of those inspections.
3. BO 6240.5 para 4.a(2) Maintain copies of this order and reference (b) at work sites where hazardous material and waste are routinely handled, stored or generated and ensure that personnel are familiar with the contents thereof.
4. BO 11090.1B, enclosure 2 para 1c - posting of Oil Spill Procedures - Signs shall be posted in every building, tank location and field service location where oil or hazardous materials are used. The sign shall have a yellow background with black lettering. See BO 11090.1B for proper wording of sign.
5. CG ltr 6240 NREAD of 10 Nov 86, provided by 6240 NREAD 20 Nov 86 - requires the posting and development of sites specific Hazardous Waste spill responsibilities prevention and related guidance.



AUTHORIZED HAZARDOUS WASTE GENERATION & STORAGE SITES FOR 2d SUPPLY BN

SITE NO. 1  
GENERATION/ACCUMULATION

✓ Bldg. #FC-263, Motor Transport Co.  
SOLVENTS, WASTE OIL, & ELECTROLYTE

SITE NO. 2  
GENERATION/ACCUMULATION

Bldg. #915, Preservation, Packaging &  
Packing (PP&P)  
SOLVENTS

SITE NO. 3  
GENERATION

Bldg. #916, Deployment Support Unit  
SOLVENTS, ELECTROLYTE & LITHIUM  
BATTERIES

SITE NO. 4  
GENERATION

Bldg. TP-457, Flammable Storage  
Warehouse, Supply Management Unit

